

# EXHIBIT B

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March 23, 2004

VIA FACSIMILE (216) 274-2514Steven A. Goldfarb, Esq.  
Hahn Loeser & Parks LLP  
3300 PB Tower  
200 Public Square  
Cleveland, Ohio 44114-2301RE: *THI v. Govan*, Case No. C-1-01-784

Dear Mr. Goldfarb:

Pursuant to FRCP 45(c)(2)(B), this letter constitutes written objections to the subpoena I received by fax demanding production of my firm's billing records in this case. For the reasons set forth below, we object to the production of such records.

First, regarding your evidence of attorneys fees, I am disappointed that I agreed to extend your time to respond to our objections based on your associate Nancy Oliver's representation that she was going on vacation. Had I known that you needed the additional time in order to serve a subpoena for our records and to review those records prior to responding to our objections, I would not have agreed to the extension.


Second, our billing records are not pertinent to your firm's billings on this case. All that matters is the time and money your firm expended and whether it was reasonable. Further, my firm represented our client against two parties: your client the plaintiff, as well

Steven A. Goldfarb, Esq.  
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as cross-claim defendant Cincinnati Travelodge. Thus, much of our fees and costs are irrelevant to the time and money expended in simply defending your client's complaint.

Based on these objections, we do not intend to comply with the subpoena and produce our billing records.

Very truly yours,

 / FOR  
Eric C. Holzappel

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